

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROBERT H. KOONS, JR. and	:	
SALLY KOONS, his wife,	:	CIVIL ACTION
Plaintiffs,		:
v.	:	
		JURY TRIAL DEMANDED
PIEDMONT HAWTHORNE AVIATION,	:	
HAWTHORNE A-B-E, INC., n/k/a	:	
HAWTHORNE AIRPORT SERVICES, INC.,	:	
and PIEDMONT HAWTHORNE	:	
HOLDINGS, INC.	:	No. 02CV2739
Defendants.		:

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION IN LIMINE  
TO LIMIT MEDICAL EXPENSES TO THE AMOUNT ACTUALLY PAID  
AND ACCEPTED AS FULL PAYMENT FOR SERVICES RENDERED**

Defendant Piedmont Hawthorne moves this Court for an Order limiting medical expenses actually paid by health care insurance providers. As the parties discussed in Chambers during the Pretrial Conference, plaintiffs agree to only request payment of past medical expenses that were paid by health insurance providers and other medical expenses permitted by the Pennsylvania Supreme Courts ruling in Morehead v. Crozer Chester Med. Center, 564 Pa 156, 765 A.2d 786 (2001). Therefore, plaintiffs request the Court to deny defendants' Motion, find it moot or, in the alternative, delay disposition of this motion until

the parties had an opportunity to agree to a stipulated amount of medical damages.

Respectfully submitted,

WOLK & GENTER

BY:

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